

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
EMELIKE NWOSUOCHA, :
:
Plaintiff, : 1:21-cv-04047 (VM)
:
v. :
:
DONALD MCKINLEY GLOVER, II, et al. :
:
Defendants. :
:
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**STIPULATION TO EXTEND DEFENDANTS' TIME TO
ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT**

WHEREAS, on May 6, 2021, Plaintiff Emelike Nwosuocha filed his Complaint (the "Complaint") in the above-captioned action;

WHEREAS, Donald McKinley Glover, II, Ludwig Emil Tomas Goransson, Kobalt Music Publishing America, Inc. d/b/a Songs of Kobalt Music Publishing, RCA Records ("RCA"), Sony Music Entertainment ("SME"), Young Stoner Life Publishing, LLC, Theory Entertainment LLC d/b/a 300 Entertainment, Atlantic Recording Corporation, Roc Nation Publishing LLC d/b/a Songs of Roc Nation, Songs of Universal, Inc., Warner Music Group Corp., and Warner-Tamerlane Publishing Corp. are named defendants in the Complaint (collectively, the "Defendants" or individually "Defendant");

WHEREAS, Plaintiff has either served or purported to serve each Defendant with a copy of the Summons and Complaint, but has not served RCA and Jeffrey Lamar Williams;

WHEREAS, RCA is a division or unit owned and operated by SME;

WHEREAS, RCA hereby accepts service of process of the Summons and Complaint;

WHEREAS, Defendants agree not to contest service of process in exchange for receiving additional time to answer, move, or otherwise respond to the Complaint;

WHEREAS, Plaintiff acknowledges that he will save considerable time and expense by entering into this stipulation; and

WHEREAS, all of the parties to this stipulation agree that establishing one date for Defendants to answer, move, or otherwise respond to the Complaint advances the interests of judicial economy and saves the parties time and expense;

NOW, THEREFORE, Plaintiff and Defendants, by and through their undersigned counsel or agents, hereby stipulate as follows:

1. Defendants shall answer, move, or otherwise respond to the Complaint on or before Wednesday, December 8, 2021.

2. Defendants preserve all of their respective challenges, defenses, and responses to the Complaint, except they shall not raise the defense of improper service of process.

3. This stipulation may be signed in counterparts, and any facsimile/PDF/electronic signatures shall be deemed original signatures.

Dated: October 13, 2021
New York, New York

AIDALA BERTUNA & KAMINS PC.

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*For purposes of this stipulation only,
Attorneys for Defendants Atlantic Recording
Corporation, Warner-Tamerlane Publishing
Corp., Warner Music Group Corp., Kobalt
Music Publishing America, Inc., d/b/a Songs
of Kobalt Music Publishing, RCA Records,
Sony Music Entertainment, Young Stoner Life
Publishing, LLC, Theory Entertainment LLC
d/b/a 300 Entertainment, and Songs of
Universal, Inc.*

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*As authorized signatory for purposes of this
stipulation o/b/o Defendant Ludwig Emil
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SO ORDERED:

The Honorable Victor Marrero
United States District Court Judge